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UNITED STATES BANKRUPTCY COURT  
NORTHER DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

In Re:

**JAMIE MACIAS-NGUYEN,**  
  
Debtor.

Case No.: 17-52896 MEH 7

Adversary No.: 18-05019

Chapter 7

**ANSWER TO COMPLAINT**

**JASON BARNES**

Plaintiff,

v.

**JAMIE MACIAS-NGUYEN,**  
  
Defendant.

**DEFENDANT’S ANSWER TO PLAINTIFFS’ COMPLAINT FOR NON-  
DISCHARGEABILITY OF DEBT**

Jamie Macias-Nguyen, the defendant herein, by and through Sagaria Law, P.C.,  
Defendant’s attorneys, answering the Complaint to Determine Dischargeability of a Debt,

1. Admit the allegations contained in paragraphs 2, 4, 6, 11, 45, 69 of said complaint.
2. Deny each and every allegation contained in paragraphs 5, 7, 12-14, 16-29, 43, 46-53,  
56-60, 64-68, 71-74 79-80 of said Complaint.

1 3. Defendant does not have enough information available to her to accurately affirm or  
2 deny the allegations in paragraphs 1, 3, 9-10, 15, 30-42, 44, 61-63, 76 of Plaintiff's complaint.

3 4. Defendant admits the allegation in paragraph 8 to the extent the allegation is that  
4 Defendant was married. Plaintiff does not have enough information to confirm the other  
5 allegations therein.

6 5. Defendant admits the allegation in paragraph 70 to the extent plaintiff alleges  
7 Defendant produced a copy of a check. Plaintiff does not have enough information to confirm  
8 or deny the other allegations therein.

9 6. Defendant answers the allegations in the paragraphs incorporated by reference in  
10 paragraphs 75 and 78 as answered in the paragraphs above.

11 7. Defendant respectfully requests that the relief sought on in paragraphs 77, 81-82 of the  
12 Complaint be denied.

### 13 **AFFIRMATIVE DEFENSES**

#### 14 **First Affirmative Defense**

##### 15 **(Uncertainty)**

16 As a first, separate, and affirmative defense to each and every cause of action alleged in  
17 the Complaint, Defendant allege that each of those causes of action is ambiguous and/or  
18 unintelligible.

#### 19 **Second Affirmative Defense**

##### 20 **(Laches)**

21 As a second, separate, and affirmative defense to each and every cause of action alleged  
22 in the Complaint, Defendant allege that each of those causes of action are barred by the  
23 equitable doctrine of laches due to Plaintiffs' acts and/or omissions.

#### 24 **Third Affirmative Defense**

##### 25 **(Unclean Hands)**

26 As an Third, separate, and affirmative defense to each and every cause of action alleged  
27 in the Complaint, Defendant allege that each of those causes of action are barred by the  
28 doctrine of unclean hands due to Plaintiffs' acts and/or omissions.

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